

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS**

Index No.: _____/19

-----X
MICHAEL PARNESS,

**Plaintiff designates
QUEENS COUNTY
as place of trial.**

Plaintiff,

-against -

**The basis of venue is where
the alleged acts occurred**

**ELMHURST GENERAL HOSPITAL, NYC HEALTH
AND HOSPITALS and NEW YORK-
PRESBYTERIAN/COLUMBIA UNIVERSITY
MEDICAL CENTER,**

**Plaintiff's residence address
at
11 Pine Street, #140
Montclair, NJ 07042**

Defendants.
-----X

SUMMONS


To the above-named defendants:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiff's Attorneys within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York): and in case your failure to appear or answer, judgement will be taken for the relief demanded herein.

**A COPY OF THIS SUMMONS WAS FILED WITH THE CLERK OF THE COURT,
QUEENS COUNTY ON _____ IN COMPLIANCE WITH CPLR §§305(a) AND
306(a).**

Dated: New York, New York
August 14, 2019

MERSON LAW, PLLC

By: 
Jordan K. Merson
Attorneys for Plaintiff
150 East 58th Street 34th Floor
New York, New York 10155
(212) 603-9100

TO:

ELMHURST GENERAL HOSPITAL

79-01 Broadway
Elmhurst, NY 11373

NYC HEALTH AND HOSPITALS

125 Worth Street
New York, NY 10013

NEW YORK-PRESBYTERIAN/COLUMBIA UNIVERSITY MEDICAL CENTER

622 West 168th Street
New York, NY 10032

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

Index No.:

_____/19

-----X
MICHAEL PARNESS,

Plaintiff,

-against -

**VERIFIED
COMPLAINT**ELMHURST GENERAL HOSPITAL, NYC HEALTH
AND HOSPITALS and NEW YORK-
PRESBYTERIAN/COLUMBIA UNIVERSITY
MEDICAL CENTER,Defendants.
-----XPlaintiff(s), above named, complaining of the defendants, by **MERSON LAW,**

PLLC., respectfully allege(s):

NATURE OF THE CLAIM

1. This is a case of plaintiff, Michael Parness, who was sexually abused as a child at Elmhurst General Hospital ("Elmhurst General"), NYC Health and Hospitals ("NYC Health") and New York-Presbyterian/Columbia University Medical Center ("New York-Presbyterian") by older patients while staff members stood by and laughed at him and encouraged, endorsed and/or promoted the abuse and by members of the hospital staff.
2. Elmhurst General, NYC Health and New York-Presbyterian were aware that minor aged patients were being sexually abused by older patients and staff members and did nothing to stop it or keep the dangerous predators away from the minor aged patients.
3. In or about 1970, staff members while acting under the scope of their employment with Elmhurst General and NYC Health and on behalf of Elmhurst General and NYC Health, sexually abused plaintiff then approximately seven years old by sodomizing him with a broomstick, raping him and watching and laughing as older patients sexually abused him

by forcing him to perform oral sex on an older boy and the staff members did nothing to stop it.

4. Beginning in or about 1970 and continuing until approximately 1971, staff members while acting under the scope of employment with New York Presbyterian and on behalf of New York Presbyterian, watched as plaintiff was sexually abused by other patients and did nothing to stop it.
5. Plaintiff brings this lawsuit to recover for the emotional and physical suffering he incurred because of the negligence of Elmhurst General Hospital, NYC Health and Hospitals and New York -Presbyterian/Columbia University Medical Center and to make sure no other child is forced to suffer the abuse and physical and mental trauma he felt and continues to feel.

PARTIES

6. At all times herein mentioned defendant **ELHURST GENERAL HOSPITAL** was a domestic corporation organized and authorized to do business under the laws of the State of New York.
7. At all times herein mentioned, defendant **ELHURST GENERAL HOSPITAL** was located at 79-01 Broadway, Elmhurst, New York 11373.
8. At all times herein mentioned defendant **NYC HEALTH AND HOSPITALS** was a domestic corporation organized and authorized to do business under the laws of the State of New York.
9. At all times herein mentioned, defendant **NYC HEALTH AND HOSPITALS** was located at 125 Worth Street, New York, New York 10013.
10. At all times herein mentioned, defendant **NYC HEALTH AND HOSPITALS** operated and controlled defendant **ELMHURST GENERAL HOSPITAL**.

11. At all times herein mentioned, defendants **ELMHURST GENERAL HOSPITAL** and **NYC HEALTH AND HOSPITALS** were agents, servants employees and/or alter egos of each other.
12. At all times herein mentioned defendant **NEW YORK-PRESBYTERIAN/COLUMBIA UNIVERSITY MEDICAL CENTER** was a domestic corporation organized and authorized to do business under the laws of the State of New York.
13. At all times herein mentioned, defendant **NEW YORK-PRESBYTERIAN/COLUMBIA UNIVERSITY MEDICAL CENTER** was located at 79-01 Broadway, Elmhurst, New York 11373.

FACTS OF THE CASE

14. Defendants **ELMHURST GENERAL HOSPITAL**, **NYC HEALTH AND HOSPITALS**, and **NEW YORK-PRESBYTERIAN/COLUMBIA UNIVERSITY MEDICAL CENTER**'s negligence and recklessness caused the staff members and patients to have access to children, including on company premises, despite its knowledge that the staff members and patients sexually abused children and/or had the propensity to sexually abuse to do so and therefore are responsible for the injuries that Plaintiff incurred because but for Defendants **ELMHURST GENERAL HOSPITAL**, **NYC HEALTH AND HOSPITALS**, and **NEW YORK-PRESBYTERIAN/COLUMBIA UNIVERSITY MEDICAL CENTER**'s negligence, Plaintiff would not have suffered the mental and physical anguish inflicted by the staff members and patients. Defendants **ELMHURST GENERAL HOSPITAL**, **NYC HEALTH AND HOSPITALS**, and **NEW YORK-PRESBYTERIAN/COLUMBIA**

UNIVERSITY MEDICAL CENTER's gross negligence, reckless, wanton and/or willful conduct warrants punitive liability.

15. In or about 1970, plaintiff was seven years old and was a patient at Elmhurst General and/or NYC Health and Hospitals. While at Elmhurst General and/or NYC Health and Hospitals, plaintiff and other young patients were sexually abused by a fourteen-year-old patient who made them perform oral sex on him while the nurses and other hospital staff members watched and laughed at them.
16. Additionally, while plaintiff was a patient at Elmhurst General and/or NYC Health and Hospitals, staff members of Elmhurst General and/or NYC Health and Hospitals sodomized plaintiff by sticking a broom stick up his anus and raped him.
17. Beginning in or about 1970 and continuing until approximately 1971, plaintiff was a patient at New York-Presbyterian. Plaintiff was repeatedly sexually abused by other patients at New York-Presbyterian while staff members watched.
18. Plaintiff told Dr. John Dintenfass that he was being sexually abused by other patients, and Dr. Dintenfass did nothing to stop the abuse. At all times herein mentioned, Dr. Dintenfass was an agent, servant and/or employee of New York-Presbyterian and was acting within the scope of his employment with New York-Presbyterian.
19. As such, Plaintiff suffered catastrophic and lifelong injuries as a result of defendant's negligence in undertaking a duty, including, but not limited to, to keep its patients safe from predators and failing to act in accord with that duty by allowing the staff members to continue their role where they had the access and the means to prey on young children like Plaintiff, and the hospital had a duty to supervise their staff members and patients.

AS FOR A FIRST CAUSE OF ACTION FOR NEGLIGENCE AGAINST

ELMHURST GENERAL HOSPITAL

20. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 19., inclusive, with the same force and effect as if hereinafter set forth at length.
21. At all times mentioned herein, defendant **ELMHURST GENERAL HOSPITAL** owed a duty of care, including in loco parentis, to keep its minor aged patients in its hospital safe from sexual abuse by its agents, servants and/or employees under its supervision and control, including on company premises, that ultimately befell the Plaintiff, and they had a duty to supervise their staff members and patients.
22. At all times herein mentioned, defendant **ELMHURST GENERAL HOSPITAL** owed a duty of care to properly supervise its agents, servants and/or employees to ensure that its children patients were not being abused by its agents, servants and/or employees on its premises.
23. At all times mentioned herein, defendant **ELMHURST GENERAL HOSPITAL** and/or its agents, servants and/or employees breached the above-stated duty in a negligent, reckless, willful and wanton manner, and caused Plaintiff to be sexually assaulted.
24. As a result of the negligence of defendant **ELMHURST GENERAL HOSPITAL** and/or its agents, servants and/or employees, plaintiff was caused serious personal injuries, emotional distress, mental pain and suffering, mental anguish and/or physical manifestations thereof, and other losses, all of which have not as of yet been ascertained.
25. By reason of the foregoing, Plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate.
26. By reason of the foregoing, Plaintiff is entitled to punitive damages from defendants in such sums as a jury would find fair, just and adequate.

27. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

28. This action falls within exceptions to Article 16 of the C.P.L.R.

AS FOR A SECOND CAUSE OF ACTION FOR NEGLIGENT HIRING, RETENTION

AND SUPERVISION AGAINST ELMHURST GENERAL HOSPITAL

29. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 28., inclusive, with the same force and effect as if hereinafter set forth at length.

30. Defendant **ELMHURST GENERAL HOSPITAL**, had a duty to supervise and prevent known risks of harm to its patients.

31. Defendant was negligent in hiring, retaining and supervising the nurses and other staff members and other hospital agents, servants and/or employees who were careless, unskillful, negligent, reckless and acted in a willful and wanton manner in not possessing the requisite knowledge, skill and moral character of hospital staff who should have properly been supervising the staff and minor aged patients to ensure the safety of the minor aged patients.

32. Defendant **ELMHURST GENERAL HOSPITAL** knew or should have known that the staff members sexually assaulted plaintiff and/or had the capacity and/or propensity to do so.

33. As a result of such negligent hiring, supervising and retention, Plaintiff was caused to suffer serious personal injuries, emotional distress, conscious pain and suffering, mental anguish and/or physical manifestations thereof, and other losses, all of which have not as of yet been ascertained.

34. By reason of the foregoing, Plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate.
35. By reason of the foregoing, Plaintiff is entitled to punitive damages from defendant in such sums as a jury would find fair, just and adequate.
36. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
37. This action falls within exceptions to Article 16 of the C.P.L.R.

**AND AS FOR A THIRD CAUSE OF ACTION FOR NEGLIGENT INFLICTION OF
EMOTIONAL DISTRESS AGAINST ELMHURST GENERAL HOSPITAL**

38. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 37., inclusive, with the same force and effect as if herein set forth at length.
39. Defendant **ELMHURST GENERAL HOSPITAL** and their agents, servants and/or employees, knew or reasonably should have known that the failure to properly advise, supervise and hire its staff members would and did proximately result in physical and emotional distress to Plaintiff.
40. Defendant **ELMHURST GENERAL HOSPITAL** and their agents, servants and/or employees, knew or reasonably should have known that the failure to properly supervise its patients would and did proximately result in physical and emotional distress to Plaintiff.
41. Defendant **ELMHURST GENERAL HOSPITAL** and their agents, servants and/or employees knew or reasonably should have known that the sexual abuse and other improper conduct would and did proximately result in physical and emotional distress to Plaintiff.

42. Defendant has the power, ability, authority and duty to intervene with and/or stop the improper conduct that resulted in Plaintiff being sexually abused by staff members and other patients.
43. Despite said knowledge, power and duty, defendant negligently failed to act so as to stop, prevent, and prohibit the improper conduct that resulted staff members and other patients sexually abusing Plaintiff.
44. By reason of the foregoing, Plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate.
45. By reason of the foregoing, Plaintiff is entitled to punitive damages from defendant in such sums as a jury would find fair, just and adequate.
46. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
47. This action falls within exceptions to Article 16 of the C.P.L.R.

AS FOR A FOURTH CAUSE OF ACTION FOR NEGLIGENCE AGAINST

NYC HEALTH AND HOSPITALS

48. Plaintiffs repeat, reiterate and reallege each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 47., inclusive, with the same force and effect as if hereinafter set forth at length.
49. At all times mentioned herein, defendant **NYC HEALTH AND HOSPITALS** owed a duty of care, including in loco parentis, to keep its minor aged patients in its hospital safe from sexual abuse by its agents, servants and/or employees under its supervision and control, including on company premises, that ultimately befell the Plaintiff, and they had a duty to supervise their staff members and patients.

50. At all times herein mentioned, defendant **NYC HEALTH AND HOSPITALS** owed a duty of care to properly supervise its agents, servants and/or employees to ensure that its children patients were not being abused by its agents, servants and/or employees on its premises.
51. At all times mentioned herein, defendant **NYC HEALTH AND HOSPITALS** and/or its agents, servants and/or employees breached the above-stated duty in a negligent, reckless, willful and wanton manner, and caused Plaintiff to be sexually assaulted.
52. As a result of the negligence of defendant **NYC HEALTH AND HOSPITALS** and/or its agents, servants and/or employees, plaintiff was caused serious personal injuries, emotional distress, mental pain and suffering, mental anguish and/or physical manifestations thereof, and other losses, all of which have not as of yet been ascertained.
53. By reason of the foregoing, Plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate.
54. By reason of the foregoing, Plaintiff is entitled to punitive damages from defendants in such sums as a jury would find fair, just and adequate.
55. The Notice of Claim provisions of General Municipal Law § 50-e and 50-i are inapplicable to the within action.
56. Because the Notice of Claim provisions are inapplicable to the within action, the condition precedent for General Municipal Law need not be met.
57. This action has been timely commenced as against **NYC HEALTH AND HOSPITALS**, pursuant to the Child Victims Act and CPLR §208(b).
58. Plaintiff has complied with all of the statutory conditions precedent to the commencement of this action.

59. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
60. This action falls within exceptions to Article 16 of the C.P.L.R.

**AS FOR A FIFTH CAUSE OF ACTION FOR NEGLIGENT HIRING, RETENTION
AND SUPERVISION AGAINST NYC HEALTH AND HOSPITALS**

61. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 60., inclusive, with the same force and effect as if hereinafter set forth at length.
62. Defendant **NYC HEALTH AND HOSPITALS**, had a duty to supervise and prevent known risks of harm to its patients.
63. Defendant was negligent in hiring, retaining and supervising the nurses and other staff members and other hospital agents, servants and/or employees who were careless, unskillful, negligent, reckless and acted in a willful and wanton manner in not possessing the requisite knowledge, skill and moral character of hospital staff who should have properly been supervising the staff and minor aged patients to ensure the safety of the minor aged patients.
64. Defendant **NYC HEALTH AND HOSPITALS** knew or should have known that the staff members sexually assaulted plaintiff and/or had the capacity and/or propensity to do so.
65. As a result of such negligent hiring, supervising and retention, Plaintiff was caused to suffer serious personal injuries, emotional distress, conscious pain and suffering, mental anguish and/or physical manifestations thereof, and other losses, all of which have not as of yet been ascertained.

66. By reason of the foregoing, Plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate.
67. By reason of the foregoing, Plaintiff is entitled to punitive damages from defendant in such sums as a jury would find fair, just and adequate.
68. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
69. This action falls within exceptions to Article 16 of the C.P.L.R.

**AND AS FOR A SIXTH CAUSE OF ACTION FOR NEGLIGENT INFLICTION OF
EMOTIONAL DISTRESS AGAINST NYC HEALTH AND HOSPITALS**

70. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 69., inclusive, with the same force and effect as if herein set forth at length.
71. Defendant **NYC HEALTH AND HOSPITALS** and their agents, servants and/or employees, knew or reasonably should have known that the failure to properly advise, supervise and hire its staff members would and did proximately result in physical and emotional distress to Plaintiff.
72. Defendant **ELMHURST GENERAL HOSPITAL** and their agents, servants and/or employees, knew or reasonably should have known that the failure to properly supervise its patients would and did proximately result in physical and emotional distress to Plaintiff.
73. Defendant **NYC HEALTH AND HOSPITALS** and their agents, servants and/or employees knew or reasonably should have known that the sexual abuse and other improper conduct would and did proximately result in physical and emotional distress to Plaintiff.

74. Defendant has the power, ability, authority and duty to intervene with and/or stop the improper conduct that resulted in Plaintiff being sexually abused by staff members and other patients.
75. Despite said knowledge, power and duty, defendant negligently failed to act so as to stop, prevent, and prohibit the improper conduct that resulted staff members and other patients sexually abusing Plaintiff.
76. By reason of the foregoing, Plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate.
77. By reason of the foregoing, Plaintiff is entitled to punitive damages from defendant in such sums as a jury would find fair, just and adequate.
78. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
79. This action falls within exceptions to Article 16 of the C.P.L.R.

**AS FOR A SEVENTH CAUSE OF ACTION FOR NEGLIGENCE AGAINST
NEW YORK-PRESBYTERIAN/COLUMBIA UNIVERSITY MEDICAL CENTER**

80. Plaintiffs repeat, reiterate and reallege each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 79., inclusive, with the same force and effect as if hereinafter set forth at length.
81. At all times mentioned herein, defendant **NEW YORK-PRESBYTERIAN/COLUMBIA UNIVERSITY MEDICAL CENTER** owed a duty of care, including in loco parentis, to keep its minor aged patients in its hospital safe from sexual abuse by its agents, servants and/or employees under its supervision and control, including on company premises, that ultimately befell the Plaintiff, and they had a duty to supervise their staff members and patients.

82. At all times herein mentioned, defendant **NEW YORK-PRESBYTERIAN/COLUMBIA UNIVERSITY MEDICAL CENTER** owed a duty of care to properly supervise its agents, servants and/or employees to ensure that its children patients were not being abused by its agents, servants and/or employees on its premises.
83. At all times mentioned herein, defendant **NEW YORK-PRESBYTERIAN/COLUMBIA UNIVERSITY MEDICAL CENTER** and/or its agents, servants and/or employees breached the above-stated duty in a negligent, reckless, willful and wanton manner, and caused Plaintiff to be sexually assaulted.
84. As a result of the negligence of defendant **NEW YORK-PRESBYTERIAN/COLUMBIA UNIVERSITY MEDICAL CENTER** and/or its agents, servants and/or employees, plaintiff was caused serious personal injuries, emotional distress, mental pain and suffering, mental anguish and/or physical manifestations thereof, and other losses, all of which have not as of yet been ascertained.
85. By reason of the foregoing, Plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate.
86. By reason of the foregoing, Plaintiff is entitled to punitive damages from defendants in such sums as a jury would find fair, just and adequate.
87. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
88. This action falls within exceptions to Article 16 of the C.P.L.R.

AS FOR A EIGHTH CAUSE OF ACTION FOR NEGLIGENT HIRING, RETENTION
AND SUPERVISION AGAINST
NEW YORK-PRESBYTERIAN/COLUMBIA UNIVERSITY MEDICAL CENTER

89. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 88., inclusive, with the same force and effect as if hereinafter set forth at length.
90. Defendant **NEW YORK-PRESBYTERIAN/COLUMBIA UNIVERSITY MEDICAL CENTER**, had a duty to supervise and prevent known risks of harm to its patients.
91. Defendant was negligent in hiring, retaining and supervising the nurses and other staff members and other hospital agents, servants and/or employees who were careless, unskillful, negligent, reckless and acted in a willful and wanton manner in not possessing the requisite knowledge, skill and moral character of hospital staff who should have properly been supervising the staff and minor aged patients to ensure the safety of the minor aged patients.
92. Defendant **NYC NEW YORK-PRESBYTERIAN/COLUMBIA UNIVERSITY MEDICAL CENTER** knew or should have known that the staff members sexually assaulted plaintiff and/or had the capacity and/or propensity to do so.
93. As a result of such negligent hiring, supervising and retention, Plaintiff was caused to suffer serious personal injuries, emotional distress, conscious pain and suffering, mental anguish and/or physical manifestations thereof, and other losses, all of which have not as of yet been ascertained.
94. By reason of the foregoing, Plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate.
95. By reason of the foregoing, Plaintiff is entitled to punitive damages from defendant in such sums as a jury would find fair, just and adequate.
96. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

97. This action falls within exceptions to Article 16 of the C.P.L.R.

AND AS FOR A NINETH CAUSE OF ACTION FOR NEGLIGENT INFLICTION OF
EMOTIONAL DISTRESS AGAINST
NEW YORK-PRESBYTERIAN/COLUMBIA UNIVERSITY MEDICAL CENTER


98. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 97., inclusive, with the same force and effect as if herein set forth at length.
99. Defendant **NEW YORK-PRESBYTERIAN/COLUMBIA UNIVERSITY MEDICAL CENTER** and their agents, servants and/or employees, knew or reasonably should have known that the failure to properly advise, supervise and hire its staff members would and did proximately result in physical and emotional distress to Plaintiff.
100. Defendant **NEW YORK-PRESBYTERIAN/COLUMBIA UNIVERSITY MEDICAL CENTER** and their agents, servants and/or employees, knew or reasonably should have known that the failure to properly supervise its patients would and did proximately result in physical and emotional distress to Plaintiff.
101. Defendant **NEW YORK-PRESBYTERIAN/COLUMBIA UNIVERSITY MEDICAL CENTER** and their agents, servants and/or employees knew or reasonably should have known that the sexual abuse and other improper conduct would and did proximately result in physical and emotional distress to Plaintiff.
102. Defendant has the power, ability, authority and duty to intervene with and/or stop the improper conduct that resulted in Plaintiff being sexually abused by staff members and other patients.

103. Despite said knowledge, power and duty, defendant negligently failed to act so as to stop, prevent, and prohibit the improper conduct that resulted staff members and other patients sexually abusing Plaintiff.
104. By reason of the foregoing, Plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate.
105. By reason of the foregoing, Plaintiff is entitled to punitive damages from defendant in such sums as a jury would find fair, just and adequate.
106. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
107. This action falls within exceptions to Article 16 of the C.P.L.R.

WHEREFORE, plaintiffs demand judgement against defendants in such sum as a jury would find fair, adequate and just.

Dated: New York, New York
August 14, 2019

MERSON LAW, PLLC

By: 
Jordan K. Merson
Sarah R. Cantos
Attorneys for Plaintiff
150 East 58th Street 34th Floor
New York, New York 10155
(212) 603-9100

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

Index No.:

_____/19

-----X
MICHAEL PARNESS*Plaintiff,*

-against -

**ATTORNEY
VERIFICATION**ELMHURST GENERAL HOSPITAL, NYC HEALTH
AND HOSPITALS and NEW YORK-
PRESBYTERIAN/COLUMBIA UNIVERSITY
MEDICAL CENTER,*Defendants.*-----X
JORDAN K. MERSON, an attorney duly admitted to practice in the Courts of New York
State, and a member of the firm MERSON LAW, PLLC., attorneys for the plaintiffs in the
within action, hereby affirms under penalty of perjury:

That he has read the within complaint and knows the contents thereof, and that the same
is true to his own knowledge, except as to the matters therein stated to be alleged upon
information and belief, and that as to those matters he believes it to be true.

That the sources of his information and knowledge are investigations and records in the
file.

That the reason this verification is made by affirmant and not by the plaintiff is that the
plaintiff is not within the County where the attorney has his office.

Dated: New York, New York
August 14, 2019

_____
JORDAN K. MERSON

Index No.

Year 2019

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

MICHAEL PARNESS,

Plaintiff,

- against -

ELMHURST GENERAL HOSPITAL, NYC HEALTH
AND HOSPITALS and NEW YORK-
PRESBYTERIAN/COLUMBIA UNIVERSITY
MEDICAL CENTER,

Defendants,

SUMMONS AND VERIFIED COMPLAINT

Merson Law, PLLC.

Attorneys for Plaintiff(s)

Office and Post Office Address, Telephone
150 East 58th Street 34th Fl.
New York, New York 10155
(212) 603-9100

To: All Parties
